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and DEEPAK SHARMA*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

BYTEDANCE INC. AND TIKTOK INC.,

Plaintiffs,

v.

ADVANCED CODING TECHNOLOGIES LLC,
ANJAY TECHNOLOGY PARTNERS LLC,
ANJAY VENTURE PARTNERS LLC, and
DEEPAK SHARMA,

Defendant.

Case No. 4:23-cv-1412-HSG

**STIPULATION AND ORDER
EXTENDING TIME FOR
BRIEFING ON MOTION TO STAY
JURISDICTIONAL DISCOVERY**

DEMAND FOR JURY TRIAL

Pursuant to Civil L.R. 6-1 and 6-2, as supported by the declaration of Jeanel N. Sunga, filed herewith, Plaintiffs, ByteDance Inc. and TikTok Inc., and Defendants, Advanced Coding Technologies LLC, Anjay Technology Partners LLC, Anjay Venture Partners LLC, and Deepak Sharma, hereby stipulate to extend the time for Plaintiffs to file their opposition to Defendants' Motion to Stay Jurisdictional Discovery, based on the following facts:

1.) 1. On March 24, 2023, Plaintiffs filed their Complaint against Defendants. (Dkt. No.

2. On June 19, 2023, Plaintiffs served Defendants with their First Set of Venue Requests for Production and First Set of Venue Interrogatories.

3. On June 30, 2023, Defendants filed their Motion to Stay Jurisdictional Discovery.
(Dkt. No. 56.)

4. On July 3, 2023, the Court issued an Order regarding the briefing schedule for the motion. (Dkt. No. 59.) The Court granted the parties' stipulation to modify the briefing schedule on the motion to stay jurisdictional discovery, which provided that the Plaintiffs' response is due on July 10, 2023, and the hearing on the Defendants' motion is set for argument on July 27, 2023.

5. As set forth in the accompanying Declaration of Jeanel N. Sunga, good cause exists for the stipulated extension because, in light of other competing deadlines and the intervening Fourth of July holiday, it will allow Plaintiffs' counsel sufficient time to evaluate the issues and the parties' positions regarding the motion. Therefore, on July 7, 2023, Plaintiffs asked whether Defendants would oppose a three-day extension (from July 10, 2023, to July 13, 2023) for Plaintiffs to file their response to Defendants' Motion to Stay Jurisdictional Discovery. On July 7, 2023, Defendants confirmed they do not oppose the extension for Plaintiffs' response.

6. The parties agree that all other dates in the schedule will remain unchanged.

Accordingly, the parties stipulate, subject to the Court’s approval, that good cause exists for the extension and that the deadline for Plaintiffs to file their opposition to Defendants’ Motion to Stay Jurisdictional Discovery is extended by three days to July 13, 2023.

There have been two previous extensions in this case: Stipulation to Extend Time to Respond to the Initial Complaint. (Dkt. No. 16) and Stipulation to Extend the Time for Briefing on the Motion to Dismiss (Dkt. No. 43).

1 Dated: July 10, 2023

FISH & RICHARDSON P.C.

2
3 By: /s/ Jeanel N. Sunga
4 Jeanel N. Sunga

5 Attorney for Plaintiffs
6 BYTEDANCE INC. and TIKTOK INC.

7 Dated: July 10, 2023

RUSS AUGUST & KABAT

8
9 By: /s/ Benjamin T. Wang
10 Benjamin T. Wang

11 Attorney for Defendants
12 ADVANCED CODING TECHNOLOGIES
13 LLC, ANJAY TECHNOLOGY PARTNERS
14 LLC, ANJAY VENTURE PARTNERS LLC,
15 and DEEPAK SHARMA

16 **ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)**

17 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
18 document has been obtained from any other signatory to this document.

19 /s/ Jeanel N. Sunga
20 Jeanel N. Sunga

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and DEEPAK SHARMA

ORDER

BEFORE the Court is the parties' Stipulation Extending Time for Briefing on Motion to Stay Jurisdictional Discovery. Pursuant to the stipulation, the Court hereby GRANTS the stipulation, extending the deadline for Plaintiffs to serve their response to Defendants' Motion to Stay Jurisdictional Discovery from July 10, 2023 to July 13, 2023.

IT IS SO ORDERED.

Dated: 7/10/2023



Honorable Haywood S. Gilliam, Jr.
UNITED STATE DISTRICT COURT JUDGE